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DIRECT TESTIMONY ON REHEARING OF DERRICK HAMILTON  
ON BEHALF OF AMERITECH ILLINOIS  
DOCKET 00-0393

**I. INTRODUCTION AND PURPOSE**

**Q. Please state your name and business address.**

**A.** My name is Derrick F. Hamilton. My business address is 1010 Wilshire Boulevard, Los Angeles, California 90017. I am Vice President, Network Services (Data) for SBC Operations, Inc.

**Q. Please describe you educational and professional background.**

**A.** I received a Bachelor of Science in Engineering from California State University, Los Angeles in 1991 and a Master of Business Administration from the University of California, Los Angeles, in 1999. I joined Pacific Bell in 1991. Since then, I have been involved in a variety of positions supporting the operations and management of Pacific's network. Specifically, I was responsible for the operation of two central offices in the Los Angeles area and managed the copper inter-office and end office cabling operations in the Greater Los Angeles area. As General Manager, Network Operations, I was responsible for the management of service activation, service assurance and network reliability in the Greater Los Angeles region. I have also been involved in the core process reengineering activities, methods and procedures publication, new product introduction, and OSS User Support.

1    **Q.    Please describe your current responsibilities.**

2  
3    A.    I am currently responsible for Special Services and Data Services Support. My  
4           areas of responsibility include the support of Center and Field Operations for  
5           Special Services, and support of all systems for inventory, design, work  
6           management, and testing.

7    **Q.    Have you ever testified before this Commission?**

8  
9    A.    Yes, on rehearing in Docket 00-0592

10  
11   **Q.    What is the purpose of your testimony?**

12  
13   A.    I would like to address the operational impact of the Commission Order in this  
14           case (Order) as it relates to Project Pronto. Specifically, I will addresses the  
15           adverse customer service and network impacts to Illinois consumers and business  
16           customers that would occur if Ameritech Illinois were to deploy Project Pronto  
17           DSL-related facilities in accordance with the Order, particularly the requirement  
18           that CLECs be allowed to own line cards placed in Ameritech Illinois Next  
19           Generation Digital Loop Carriers (NGDLCs). I will outline the operational  
20           difficulties the Order would cause in Ameritech Illinois' ordering, provisioning,  
21           maintenance and repair processes. I will demonstrate the process, system, and  
22           technology changes that would be necessary to comply with the Order. I will  
23           describe the extensive process that Ameritech Illinois already undertakes to ensure  
24           that new technology introduced into the network complies with electrical, logical,  
25           thermal and physical criteria to ensure not only the reliability of the new  
26           component itself, but of the network to which it is proposed it be connected.

1 Finally, I'll explain why virtual "collocation" of CLEC owned line cards at a  
2 Project Pronto Remote Terminal (RT) would:

- 3 • be less efficient than the wholesale Broadband Service (BBS) offering
- 4 proposed by Ameritech Illinois.
- 5 • require extensive systems and operational changes which would take
- 6 significant time to implement at substantial cost.
- 7 • result in longer provisioning and maintenance intervals.
- 8 • reduce the reliability of the network.
- 9 • reduce the maintainability of the network.
- 10 • stifle development of additional technologies.

11 **II. ADVERSE OPERATIONAL AND NETWORK IMPACT**

12 **Q. What operational difficulties would arise if CLECs were allowed to own and**  
13 **designate line cards placed in Ameritech Illinois' Project Pronto DSL**  
14 **equipment?**

15 **A.** The most fundamental change, which would have a ripple effect throughout the  
16 relevant Ameritech Illinois processes and systems, would be from Ameritech  
17 Illinois allowing "collocation" of line cards in advance of any order (by pre-  
18 installing them in the NGDLCs) and having to install or replace individual cards  
19 on a case-by-case basis associated with CLEC service orders or trouble reports.  
20 Because the Order requires that each CLEC customer be allowed to own and use  
21 its own line cards, the CLEC would need to ship the appropriate card to  
22 Ameritech Illinois for each order (or at a minimum for a small set of orders in the

1 event the CLEC uses multi-port cards) or trouble report it submits, and would  
2 require Ameritech Illinois to associate that card with the appropriate order or  
3 trouble report. For this to occur, extensive changes to Ameritech Illinois'  
4 ordering, provisioning, maintenance and repair processes would have to take  
5 place.

6 **Q. Does Ameritech Illinois offer any services today that require it to track**  
7 **individual, CLEC-owned components of the network?**

8 A. No. Today, there are no services offered over the Ameritech Illinois network that  
9 require the tracking of individual network components owned by CLECs. The  
10 Order would require that Ameritech Illinois modify its systems to accept and  
11 process new fields of information associated with the individual pieces of  
12 inventory (i.e., line cards) received from the CLEC. Some of these changes  
13 would need to be made in systems that are not owned by Ameritech Illinois,  
14 requiring system development at substantial cost and taking a significant amount  
15 of time to implement.

16  
17 From a process perspective, Ameritech Illinois would have to make fundamental  
18 changes in the way it processes both service orders and trouble tickets. Among  
19 other things, as each line card is received, separate technicians would have to be  
20 dispatched to install the card in the network and to complete the service order or  
21 perform the work to restore the service reported in trouble. Adding new or  
22 different components to the network is a complicated process because of the  
23 configuration of the Remote Terminal and the need to maintain a clean

1 environment to ensure the equipment can operate at a high level of reliability.

2 This Order would require that the process of installing line cards, performed on a  
3 bulk basis today, be performed as orders and reports are received -- a far less  
4 efficient, more time consuming and more costly method to accomplish loading of  
5 inventory.

6 **Q. What system and process changes would be required to comply with the**  
7 **Order's line-card requirement?**

8 A. When a CLEC submits an order today for products or services that require a  
9 connection to the CLEC network, the CLEC order includes a field called the  
10 Connecting Facilities Assignment (CFA), which is passed to Ameritech Illinois.  
11 Ameritech Illinois uses this information to tell its provisioning system where the  
12 CLEC facilities and the Ameritech Illinois facilities meet. In order for Ameritech  
13 Illinois to know how to provision, maintain or repair the CLEC customer's service  
14 provided over a CLEC's line card in the Pronto DSL architecture, however,  
15 additional information would have to be passed. First, some designation  
16 identifying the type of card to be used would need to be received. CLECs have  
17 stated that they would offer different "flavors" of advanced services over this  
18 architecture, so a means to designate the different types of cards must exist  
19 (setting aside the question of whether such cards would work at all, which is  
20 addressed by other witnesses). Secondly, the CLEC would need to provide a  
21 unique identifier for each card, such as the Serial Number. This would allow  
22 Ameritech Illinois to associate the right card with the right order(s). Third, virtual  
23 channel and virtual path information would have to be provided in order to

1 connect the card to the CLEC facilities in the central office. In order for this  
2 additional information to be received and processed, changes would have to occur  
3 in the pre-ordering, ordering, provisioning, and repair OSS and many back-office  
4 systems. System fields would have to be modified so that the data can be  
5 accepted, passed and processed in the pre-ordering, ordering, provisioning,  
6 maintenance and repair flows.

7 **Q. What would it take to make these systems and operational changes? How**  
8 **much time, how much cost?**

9 A. To comply with the Commission's Order, Ameritech Illinois would have to make  
10 substantial changes to the way that it does business today. Ameritech Illinois  
11 would need to develop and implement a means of accepting and processing  
12 additional information from CLECs that would designate the type of card that the  
13 CLEC would be using in the network. This would require modifications to the  
14 pre-order OSS and associated back-office systems to provide information on the  
15 availability of a "slot." This also would require the modification (or possibly the  
16 creation of a new) system to track "slot inventory," a capability that does not exist  
17 today.

18  
19 The ordering OSS and associated back office systems also would have to be  
20 modified to accept and process information on the type of card, such as the  
21 Common Language Equipment Identifier (CLEI) and a unique identifier of the  
22 individual card (such as the Serial Number). The provisioning and maintenance  
23 back office systems would have to be modified to process this information.

1       Inventory systems would have to be modified to store new fields, work  
2       management systems would have to be modified to pass this information to  
3       technicians so that work could be performed (placing the appropriate card in the  
4       appropriate slot), and maintenance systems would have to be modified to display  
5       card and slot information for trouble isolation and dispatch purposes. In all, there  
6       are more than 20 interfaces and back-office systems that would require changes  
7       (EDI, CORBA, LEX, LASR, Multiple Middleware Services Applications, SORD,  
8       SOAC, TIRKS, LFACS, WFA/C, WFA/DO, LMOS, PICS, SOLID, TEMS, to  
9       name the ones that come immediately to mind). To identify at this time the exact  
10      manner in which each of these systems would be impacted is not possible, but  
11      they are related and complex.

12  
13      The ordering and associated back office systems would also have to be modified  
14      to create a means of inventorying and provisioning PVPs and PVC as "UNEs."  
15      There are no means in our system today to track this information for a particular  
16      CLEC, nor are there means in our provisioning systems to direct a particular  
17      service order to a portion of a PVP allocated to an individual CLEC. The creates  
18      another instance where Ameritech Illinois and the CLEC would have to maintain  
19      separate databases to track the same environment. Clearly, given the issues that  
20      are faced in the maintenance of today's Customer Facilities Assignment (CFA)  
21      databases, this introduces significant complexity and inefficiency. Further,  
22      because the Order might allow CLEC customers to obtain PVPs and PVCs in any  
23      designated amount, the chances of constant changes in allocation of PVP and

1 PVC bandwidth on a per-order basis could occur, and would present a tremendous  
2 challenge. CLECs could submit orders increasing their PVP as each order (or  
3 small set of orders) is placed, or decreasing it as each order (or small set) is  
4 disconnected. Further, the simple advantage of "sharing" in the broadband  
5 network architecture is lost with this "sub-optimal" network configuration driving  
6 increased activity for reduced benefit.

7  
8 **Q. But the FCC and this Commission have issued orders that required OSS**  
9 **changes before. How is this different?**

10 A. A primary way it is different is the magnitude of the changes that would be  
11 required by the Order. By way of comparison, I was the responsible Senior  
12 *Manager in the Network organization for the implementation of the FCC's Line*  
13 *Sharing Order* (working closely with my peers in Wholesale and Information  
14 Technology), an effort which required modifications that were far simpler than  
15 this effort would be. We attempted to implement a set of processes for providing  
16 CLEC access to HFPL within the 180 days that were allotted by the FCC, and  
17 were successful in getting a process in place that would accomplish the intent and  
18 word of the FCC's Order. However, that process is far from ideal. Because of the  
19 timeframes that are required to modify many of the proprietary back-office  
20 systems used by Ameritech Illinois, we had to engage in a number of sub-optimal  
21 solutions and extensive manual work-around to accomplish the objectives of the  
22 FCC's Order. Ameritech Illinois and the other SBC companies continue to work  
23 today to improve the HFPL product, and in the overall analysis, it will take over



1 two years and tens of millions of dollars to completely implement a mechanized  
2 solution.

3  
4 The effort necessary to implement the Commission Order here would be, in my  
5 opinion and based on my experience, at least twice as complex. The fundamental  
6 changes from a system perspective (not to mention the process change and  
7 significant technician training issues) would be far-reaching and significant. But  
8 even beyond these changes is the additional significant logistical changes that  
9 would have to be implemented for Ameritech Illinois to establish what I will term  
10 the CLEC Asset Logistical Management System (ALMS). The ALMS would:

- 11 • create handling centers;
- 12 • notify CLECs where to ship their line cards;
- 13 • match incoming cards to service orders or trouble reports (or hold  
14 them if the order or report has not been received);
- 15 • notify customers if we have an order for which we have no card;
- 16 • ship the card to an appropriate Field Operations Center (the FOC  
17 would then dispatch a technician to open the Controlled Environmental  
18 Vault (CEV) housing the RT, insert the card into the appropriate slot in  
19 the RT, and notify the downstream provisioning organizations, and  
20 ship the packaging material back to the ALMS);

- 1                   • receive back Electrostatic Discharge (ESD) packaging from the Field
- 2                   Operations Center (ESD packaging is expensive and would likely be
- 3                   requested to be recovered);
- 4                   • ship ESD packaging back to the CLEC;
- 5                   • process requests if CLECs wish to retrieve or change out cards in bulk
- 6                   (e.g. for warranty, engineering complaint or product change); and
- 7                   • handle all inquiries on card location and status from FOCs CLECs and
- 8                   other organizations involved in the provisioning or repair process.

9           Because there were potentially hundreds of RT locations that were planned for  
10          Pronto DSL facilities prior to the Order, there would need to be a means of getting  
11          the right card, matched to the right order, in the hands of a technician in order to  
12          provision the service. Line cards are sensitive pieces of electronic equipment.  
13          Each card must be enclosed in a sealed, padded, ESD safe container from the time  
14          it leaves the CLEC facility until the time that the technician is ready to remove it  
15          from the case and place it into the appropriate slot in the RT. The ALMS would  
16          have to be created from scratch, as their operations would likely be too small to  
17          effectively run as part of our normal equipment and warehousing operations  
18          today. Additionally, running them as a separate operation reduces the risk that  
19          CLEC assets could become commingled with our own.

20

21   **Q.     Can you estimate what it would cost to create an ALMS?**

1 A. Estimating the costs of the systems and process changes and the creation of the  
2 ALMS to an exact dollar figure is not possible without the creation of a system  
3 architecture to evaluate how the implementation would occur, but it is certain that  
4 the costs will be high. There is little argument that could be put forth indicating  
5 that this will not cost tens of millions of dollars, the question is simply how many  
6 tens. Ultimately figuring out an exact dollar figure would take three to six  
7 months. And, I estimate that it would take an additional two years for developing  
8 business requirements, programming, testing and implementation.

9 **Q. What are the operational impacts of having to manage capacity in this way?**

10 A. The Commission's Order would require that we fundamentally change the way  
11 that we order and allocate the equipment in our network. The changes that would  
12 be required to manage the capital allocation, capacity relief and inventory  
13 management and tracking would require extensive changes to our engineering  
14 systems, our capital management financial analysis systems and the criteria that  
15 are used to evaluate whether further investments in the network can yield a return.  
16 I am not as much of an expert on the names of the particular systems involved in  
17 the engineering and finance areas, but I do understand how they are applied.  
18 Further, applying many of the basics from my business school courses, I am  
19 convinced that the additional constraints imposed by the Commission's Order,  
20 when added to the business planning models, would increase investment (both  
21 fixed and variable cost) and reduce utilization, making the overall project less  
22 likely to yield a return (in fact, very likely to make future projects Net Present

1 Value negative, completely discouraging future investment). Other Ameritech  
2 Illinois witnesses speak to this in their testimony.

3  
4 Finally, maintaining the network would become far more complicated. Today,  
5 when there is a need to replace a certain vintage of card in the network for  
6 maintenance or reliability purposes (such as a Class A Product Change Notice, or  
7 PCN), all cards of that series are replaced in a programmed manner. If a need  
8 were to arise to replace a vintage of card, under the requirements of this Order,  
9 technicians would have to know which slots to change, and which to "skip" (since  
10 they are owned by other parties). The resulting additional complexity would  
11 cause the changeover to take much longer. In the past, we were able to make  
12 changes to entire series of cards quickly, and in many cases without customers  
13 even being aware that their service was interrupted. With the additional time that  
14 would be added to the process, the chance of customers being impacted by this  
15 activity would be significantly increased. Further complicating the situation is the  
16 fact that there is significant ownership churn in the industry. Changing over  
17 ownership (or removing services and cards in some extreme cases) is an  
18 incredibly complex ordeal. If one provider merges with or takes over another or,  
19 worst case, ceases to be a going concern, the ability to reuse that slot and card  
20 would place serious administrative burden on Ameritech Illinois, particularly if it  
21 is a multi-port card. What we used to take for granted as a simple change would  
22 instead be a major effort.

1    **Q.**     You indicate that Ameritech Illinois undertakes extensive electrical, logical,  
2           thermal and physical testing of network components today. What are those?

3    A.     In order to introduce a new component to the network, two things must be  
4           validated: First, that the component itself is reliable, and second, that it does not  
5           introduce risks to associated components to which it will connect and with which  
6           it will interact. Ameritech Illinois performs extensive evaluation of the electrical,  
7           logical, thermal and physical properties of components it introduces to the  
8           network. We ensure that the voltages and currents are safe for the network and  
9           for the employees that will handle them and that no foreign voltage or current are  
10          introduced that could harm other equipment or personnel performing work on  
11          them. We validate that software and firmware in the components is free of errors  
12          and can communicate effectively with other programs in other components or  
13          controllers. We assess the heat dissipation caused by the operation of the  
14          component to ensure that individually and collectively that amount of thermal  
15          load can be safely and efficiently removed. Finally, we validate the physical  
16          strength of the component to withstand the handling process and any anticipated  
17          abnormal physical conditions (e.g. earthquakes).

18   **Q.**     Why is allowing CLEC customers to "collocate" their own line cards less  
19           efficient?

20   A.     The requirement to allow card level "collocation" is counter to the way the  
21           network, and particularly the outside plant, is designed. Connections between  
22           pieces of plant and equipment ideally should occur at a point where the network is  
23           exposed to the lowest level of risk. This occurs at the Serving Area Interface

1 (SAI). The SAI is a terminal where one piece of plant can be connected to  
2 another at a point where it is least vulnerable (or conversely, most durable).  
3 Opening the SAI and connecting two pieces of plant together using a "jumper", or  
4 short piece of insulated wire, minimizes the exposed pieces of plant. The network  
5 was designed to allow these interfaces to be opened and closed on a daily basis.  
6 They offer adequate protection to the plant at that point because there is simply a  
7 need to protect it from tampering and only the harshest of elements.

8  
9 When SBC deploys the Pronto DSL network, it pre-loads line cards in the Remote  
10 Terminal in anticipation of growth for the area to be served. This growth is  
11 projected out for a period of one year, and the appropriate amount of inventory is  
12 placed. When a service order is received, SBC assigns the order to a port in the  
13 terminal and activates the port using software. Under the Order, each ticket (or a  
14 multiple of tickets for multiple cards) would require a dispatch, the opening of the  
15 RT, and the placement of a card. All of the other steps would still have to occur  
16 to activate the service.

17  
18 Again, this is counter to the design of the network. The network was not designed  
19 to have the "slot" (which is actually a complex receptacle for a board containing a  
20 number of components) be the interface where Ameritech Illinois' facilities  
21 connects to those of the CLEC. The process of opening up a CEV is complex.  
22 Technicians have to locate the CEV (many of which are located underground due  
23 to local zoning laws) and test it to be sure the environment inside the vault is safe.

1 It may require that the technician pump out any gases that collected in the vault  
2 prior to entering. The technician then must enter the vault, determine which slot  
3 is to be used for the card, and place the card in that slot. The technician then must  
4 leave the vault and seal it to ensure that it is environmentally isolated and that the  
5 network components inside are safe. These additional steps make slot-at-a-time  
6 provisioning far more complex, time consuming and costly, especially when  
7 compared to the faster provisioning available with the wholesale Broadband  
8 Service.

9 **Q. Why would the Commission Order result in longer provisioning and**  
10 **maintenance intervals?**

11 A. As described above, slot-at-a-time provisioning is far more complex and time  
12 consuming than provisioning under the wholesale Broadband Service or than the  
13 current provisioning system for xDSL-capable unbundled copper loops. The time  
14 required to perform the additional steps described above would be added to the  
15 provisioning and maintenance process. Separate from all of the steps required  
16 today, the act of receiving a card, routing it to the appropriate technician,  
17 dispatching that technician, and loading the card in the network would take, at a  
18 minimum, an additional two days and could take as much as four days initially to  
19 handle as a manual process, until systems solutions could be developed and  
20 implemented. Add those two to four days to the provisioning interval available  
21 today with the wholesale Broadband Service, and CLEC customers could have to  
22 wait nearly twice as long to receive service.

1 Similarly, for maintenance, instead of the technician going to the SAI and moving  
2 the customer loop to another assignment there, the process would require that the  
3 technician follow the steps to load a card in order to replace one. Granted, in  
4 some cases, an additional port may be available on another card owned by the  
5 same CLEC customer, but in many cases, the restoration of service would require  
6 access to the RT in the CEV.

7 **Q. You state that the Commission Order would reduce the reliability of the**  
8 **network. How is that possible?**

9 A. In two ways. First, the simple fact that the implementation of the Order would  
10 require more intrusion into the Remote Terminals would add risk to the network.  
11 A Remote Terminal is a sealed, environmentally-isolated area designed to protect  
12 network components from particulates, heat, moisture, and corrosives that are  
13 found in the environment. Forcing multiple trips to the RT and the opening of  
14 them puts the network at additional risk. These Remote Terminals are a means to  
15 serve not only advanced services customers, but consumer and business customers  
16 of the Ameritech Illinois network as well. All of these customers would be put at  
17 additional risk.

18  
19 Secondly, the Order currently would allow for a CLEC to place a card into the slot  
20 even when that type of card is not currently offered by Ameritech Illinois and not  
21 designed for the equipment Ameritech Illinois would deploy. This could be a  
22 card that has been developed by the vendor of the RT chassis, Alcatel, for a  
23 different model NGDLC, or even by some other third party vendor. While either



1 Alcatel or the third party vendor may assure the CLEC that the card is compatible  
2 with Ameritech Illinois' network, the introduction of this card could initiate  
3 software faults with the controller or with other cards in the chassis providing  
4 service to other customers. In some cases, a previously undetected fault could  
5 cause service outage.

6  
7 Indeed, incompatibility issues could be difficult to detect and isolate. In some  
8 cases there could be disputes over an outage caused by a card that has not been  
9 through Ameritech Illinois' extensive testing and approval process. This could  
10 result in litigation, particularly if there is impact to services such as 911. If the  
11 Commission intended to order only the provision of line cards that provide only  
12 services already tested and approved on the Ameritech Illinois network, this is of  
13 course a moot point. As a practical matter, of course, it is difficult to imagine that  
14 any CLEC would want to "collocate" cards that are already available at a lower  
15 cost though the wholesale Broadband Service, since the Broadband Service would  
16 not carry the additional costs and delays of slot-at-a-time provisioning.

17 **Q. How could a defective or incompatible line card affect 911 service?**

18 **A.** A common, perhaps the most common, use of the Pronto DSL network by CLECs  
19 would be to lease the High Frequency Portion of the Loop (HFPL) UNE for "line  
20 sharing." In a HFPL arrangement, the CLEC provides the end user's data service  
21 and the ILEC provides the end user's voice service, including 911. In the planned  
22 Pronto architecture, both services would go to the same line card, and if that line  
23 card is defective or incompatible with Ameritech Illinois' network, it could impair

1 or cause an outage of both data and voice services. In other words, Ameritech  
2 Illinois' voice customer could be put out of service because of a problem with the  
3 CLEC's line card. Ameritech Illinois could not unilaterally fix the problem until  
4 the CLEC provided a replacement card or made some other arrangements to  
5 restore service. In the meantime, Ameritech Illinois' customer could be without  
6 voice and 911 service and would in all likelihood blame Ameritech Illinois for the  
7 outage.

8 **Q. You indicated that the Order could impact the maintainability of the**  
9 **network as well. How so?**

10 **A.** For reasons similar to those above. Adding equipment to the network that has not  
11 been tested for compatibility with the Ameritech Illinois RT chassis, its associated  
12 element management systems, surveillance systems, performance monitoring  
13 systems and provisioning and repair systems introduces the likelihood that  
14 problems introduced in the network would be more difficult to identify, isolate  
15 and resolve. Additionally, CLECs will have a tendency to believe (through no  
16 fault of their own) that any failure of the card they own in the network must be  
17 attributable to a problem with the chassis or the associated systems. Extensive  
18 validation and isolation by Ameritech Illinois would be necessary to convince the  
19 CLEC customer that it is necessary to initiate the card replacement process.  
20 Because the process is so onerous (for the CLEC customer as well as Ameritech  
21 Illinois), pains would be taken to avoid it to the maximum extent possible. This  
22 could result in testing and isolation of the network that is far beyond what is  
23 necessary for Ameritech Illinois to otherwise maintain its operations, taking away

1 from the services that are provided to other consumer and business customers on  
2 the Ameritech Illinois network.

3 **Q. One of the perceived benefits of this Order is the acceleration of the**  
4 **development of new technologies that can be offered over the Ameritech**  
5 **Illinois network. Would the Order accomplish that?**

6 **A.** I don't believe so. Development of new technology to be offered over the  
7 Ameritech Illinois network is done most efficiently in conjunction with those  
8 involved in the assessment, operation and management of the network, namely  
9 Ameritech Illinois. The hardware, software, firmware, communications networks,  
10 and associated OSS, back office systems, databases, processes and employee  
11 training (on the part of both Ameritech Illinois and the CLEC customers) is  
12 extremely complex. To think that a CLEC, even as technologically savvy as some  
13 of them are, could develop technology to offer new services over the Pronto DSL  
14 network without our partnership is a fallacy. Indeed, this is specifically why  
15 Ameritech Illinois offered to work collaboratively with the CLEC community to  
16 address further solutions over our network as part of the commitments we made to  
17 the FCC in the *Pronto Waiver Order* proceeding on line-card ownership. It is in  
18 our, and our customers', best interest.

19  
20 Development of technological solutions for Ameritech Illinois' network by  
21 CLECs outside of this environment would result in an overly complex, cost laden,  
22 time-consuming process. In fact, implementation of the Order would require that  
23 Ameritech Illinois divert resources that would otherwise work toward making

1 additional capability available (in a reliable and robust manner) on the Pronto  
2 DSL network. If the Commission's goal is to spur technology, it appears to me  
3 that this Order accomplishes the opposite. For example, it would be far easier for  
4 a CLEC to develop its own technology than to develop a technology that works  
5 with the Pronto network. Indeed, there is a technology solution available today  
6 for the multiple DSL "flavors" that the CLECs claim to desire, they only need  
7 purchase and place it. Surely this is cheaper and would allow them quicker access  
8 to the market.

9  
10 A. Only if the CLECs don't know whether there is a market for these potential  
11 offerings would they choose to attempt to shift all of the risk to another party such  
12 as Ameritech Illinois. And if the market is so small as to not justify facilities-  
13 based investment by the CLECs themselves, then certainly there would be no  
14 means whatsoever for Ameritech Illinois to recover the costs associated with this  
15 Order. There are additional anti-technology risks with the Commission's Order.  
16 The high cost of implementation could drive additional DSL "flavors" to either  
17 never be developed, or, at a minimum, never be used. Further, the diversion of  
18 critical resources could preclude Ameritech Illinois from developing other  
19 services that CLEC customers desire and could get more quickly at lower cost  
20 through future enhancements to the Wholesale Broadband Services offering.

21 **Q. Does this conclude your direct testimony on rehearing?**

22 A. Yes.